1 2 3 4	BARRY J. PORTMAN Federal Public Defender ANGELA M. HANSEN Assistant Federal Public Defender 160 West Santa Clara Street, Suite 575 San Jose, CA 95113 Telephone: (408) 291-7753				
5	Counsel for Defendant ELLIOTT				
6					
7	IN THE UNITED STATES DISTRICT COURT				
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA				
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA				
10	UNITED STATES OF AMERICA,)	No. CR-06-00655-JW			
11	Plaintiff,	STIPULATION AND [PROPOSED]			
12	v.)	ORDER TO CONTINUE STATUS HEARING			
13	CHARLES EDWARD ELLIOTT, JR.,	HEARING			
14	Defendant.				
15	Defendant.				
16	Defendant, Charles Elliott, through his counsel, Assistant Federal Public Defender				
17	Angela M. Hansen, and government counsel, Assistant United States Attorney Shawna Yen,				
18	stipulate and agree to continue the status hearing date of January 8, 2007 to March 5, 2007 at				
19	1:30 p.m.				
20	On October 19, 2006, Mr. Elliott was arraigned on a one-count Indictment charging				
21	him with abusive sexual contact on federal property. The parties request to continue this case				
22	because counsel for the government has informed defense counsel that additional discovery may				
23	be produced regarding the defendant's request for additional information regarding the federal				
24	jurisdiction for the charge in this case. Additionally, defense counsel and her investigator are				
25	still investigating this case attempting to locate witnesses for conduct that allegedly occurred				
26	over three years ago. For these reasons, the parties stipulate and agree that this case needs to be				
	continued until March 5, 2006.				

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1	The parties further stipulate and agree that time should continue to be excluded under					
2	18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv) because the ends of justice served by the continuance					
3	requested outweigh the best interest of the defendant and the public in a speedy trial because the					
4	failure to grant such a continuance would unreasonably deny Mr. Elliott the time necessary for					
5	effective preparation.					
6						
7	January 4, 2007 ANGELA M. HANSEN					
8	ANGELA M. HANSEN Assistant Federal Public Defender					
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10	January 4, 2007 /S/ SHAWNA YEN					
11	Assistant United States Attorney					
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7	IN THE UNITED STATES DISTRICT COURT					
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA					
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA					
10	UNITED STATES OF AMERIC	CA,) No. CR-06-0	00655-JW		
11	Plair	itiff,		Ð ORDER TO		
12	V.) CONTINUI)	E STATUS HEARING		
13	CHARLES EDWARD ELLIOTT, JR.,))			
14	Defend	lant.)			
15						
16	Pursuant to the stipulation of the parties and good cause appearing, IT IS HEREBY					
17	ORDERED that the status hearing date of January 8, 2007 is continued until March 5, 2007 at					
18	1:30 p.m. It is FURTHER ORDERED that time will continue to be excluded under 18 U.S.C. §§					
1920	3161(h)(8)(A) and (B)(iv) for defense preparation					
21	Dated: January 5, 2007		MORABLE IAMI	ES WARE		
22	Justed States District Judge					
23						
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25						
26						

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Distribute to: Ms. Angela M. Hansen Assistant Federal Public Defender 160 West Santa Clara Street, Suite 575 San Jose, CA 95113 Counsel for Defendant Ms. Shawna Yen Assistant United States Attorney 150 Almaden Blvd., Suite 900 San Jose, CA 95113 Counsel for the United States